

**United States Bankruptcy Court  
Southern District of Texas  
Houston Division**

In re **Matthew MackAdoh**

Debtor(s)

Case No. **15-33369-H5-13**  
Chapter **13**

**RESPONSE TO TRUSTEE'S MOTION TO DISMISS (DKT #28)**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, Matthew MackAdoh, Debtor and party in interest in the above-styled and numbered case.

Debtor pleads the following in response to the Trustee's Motion to Dismiss.

1. Debtor admits the allegations alleged by the Trustee.
2. Debtor has filed his 2014, Federal Tax Return.
3. Debtor has submitted to an examination by the Trustee's accountant and said meeting has been continued.
4. Debtor shall amend his chapter 13 plan to provide for payment in full of all secured and priority claims within the terms of the plan.
5. Debtor shall amend schedules B, F, G and Form 22c to comply with the Trustee's instructions.
6. Debtor shall provide the Trustee with proof of six months income received prior to filing of this case.

WHEREFORE, Debtor respectfully requests that the Court deny the Trustee's motion, and that he have such other and further relief, both legal and equitable, to which he is justly entitled.

Respectfully submitted:

Date **August 21, 2015**

Signature */s/ Emil R. Sargent*  
**EMIL R. SARGENT**  
 TBN: 17648750  
 723 Main Street, #316  
 Houston, Texas 77002  
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Attorney for Debtor

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Response to Trustee's Motion to Dismiss was served via ECF and/or United States mail, postage prepaid and/or email on August 21, 2015 on the following parties:

William E. Heitkamp, Trustee  
heitkamp@ch13hou.com

United States Trustee  
Southern District of Texas  
USTPRegion07@USDOJ.GOV

Matthew MackAdoh  
9723 Briar Forest Drive  
Houston, TX 77002

*/s/ Emil R. Sargent*  
**EMIL R. SARGENT**